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HAYWARD AREA RECREATION AND PARK  
DISTRICT and KEVIN HART

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ  
BOLBOL, individually,

Plaintiff,

v.

ROWELL RANCH RODEO, INC.,  
HAYWARD AREA RECREATION AND  
PARK DISTRICT, HAYWARD AREA  
RECREATION AND PARK DISTRICT  
PUBLIC SAFETY MANAGER/RANGER  
KEVIN HART, and DOES 1 and 2, in  
their individually and official capacities,  
jointly and severally,

Defendants.

Case No. 3:23-cv-01652-VC

**DECLARATION OF NICHOLAS D. SYREN  
IN SUPPORT OF DEFENDANTS' CROSS  
MOTION FOR SUMMARY JUDGEMENT OR,  
IN THE ALTERNATIVE, SUMMARY  
ADJUDICATION AND OPPOSITION TO  
PLAINTIFFS' JOINT MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Hon. Vince Chhabria

Date: August 15, 2024  
Time: 10:00 a.m.  
Ct rm: 4, 17<sup>th</sup> Floor

Trial: October 21, 2024

I, Nicholas D. Syren, declare as follows:

1. I am an attorney licensed to practice before the United States District Court for the Northern District of California. I am an associate at the law firm of Allen, Glaessner, Hazelwood & Werth, LLP, and am counsel of record for defendants HAYWARD AREA RECREATION AND PARK DISTRICT and KEVIN HART ("Defendants") in this matter.

2. I have personal knowledge of the statements made in this declaration and could competently testify to them if called as a witness.

3. Attached as Ex. "A," please find a true and correct copy of pertinent portions of

1 the deposition transcript of Joseph “Pat” CuvIELlo, taken on February 20, 2024.

2 4. Attached as Ex. “B,” please find a true and correct copy of pertinent portions of  
3 the deposition transcript of Deniz Bolbol, taken on March 6, 2024.

4 5. Attached as Ex. “C,” please find a true and correct copy of pertinent portions of  
5 the true transcript of the dialogue of events at Rowell Ranch Rodeo, taken on May 20, 2022,  
6 taken from Plaintiffs Bolbol and CuvIELlo’s video footage. The true transcript contains the  
7 pertinent portions of dialogue of the events at Rowell Ranch Rodeo on May 20, 2022, produced  
8 as County of Alameda’s Document Production Bates 000368-000396.

9 6. Attached as Ex. “D,” please find a true and correct copy of pertinent portions of  
10 the true transcript of Alameda County Sheriff’s Office Deputies Body Camera Footage, taken on  
11 May 20, 2022. The true transcript contains the pertinent portions of dialogue of the events at  
12 Rowell Ranch Rodeo on May 20, 2022, produced as County of Alameda’s Document Production  
13 Bates 000342-000367.

14 7. Attached as Ex. “E,” please find a true and correct copy of body cam videos taken  
15 by Alameda County deputy sheriffs Joshua Mayfield, Sowmaya Ramadas, Christian Campbell,  
16 and Matthew Laszuk taken at Rowell Ranch Rodeo on May 20, 2022, and produced to all parties  
17 at the time of County of Alameda’s Initial Disclosures.

18 8. Attached as Ex. “F,” please find a true and correct copy of Plaintiffs’ Document  
19 Production 000014-000017, evidencing videos taken at Rowell Ranch Rodeo on May 20, 2022.

20 9. Attached as Ex. “G,” please find a true and correct copy of Plaintiffs’ Document  
21 Production 000021-000022 evidencing a photo taken of Plaintiffs and fellow demonstrators after  
22 the incident involving Plaintiffs and Mr. Hart on May 20, 2022.

23 10. Attached as Ex. “H”, please find the true and correct copy of Defendant County of  
24 Alameda’s Second Updated Rule 26 Disclosure.

25 11. Attached as Ex. “I”, please find the true and correct copy of Defendants’ Expert  
26 James Dudley’s Expert Report.

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1 I declare under penalty of perjury, under the laws of the United States of America, that the  
2 foregoing is true and correct. Executed on July 1, 2024, at San Francisco, California.

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5 /s/ Nichols D. Syren  
6 NICHOLAS D. SYREN  
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